



**BUTTERMORE NEWMAN  
DELANEY & FOLTZ, LLP**  
ATTORNEYS AT LAW

BERTRAND J. DELANNEY<sup>1</sup>  
SUSANA D. DELANNEY<sup>1</sup>  
DAVID B. FOLTZ<sup>1,3,4</sup>  
DONNA R. NEWMAN<sup>1,2</sup>

August 27, 2009

OF COUNSEL:  
GRANT M. BUTTERMORE<sup>2</sup>  
KEVIN M. DYER<sup>1,4</sup>

ADMITTED IN:

<sup>1</sup>NY  
<sup>2</sup>NJ  
<sup>3</sup>PA  
<sup>4</sup>CA

**via ECF and first class mail**

Hon. Peter G. Sheridan  
United States District Court Judge  
for the District of New Jersey  
Clarkson S. Fisher Bldg.  
& U.S. Courthouse  
Trenton, New Jersey 08608

**Re: United States v. Michael Velez  
Docket No. 2:08-00389-PGS-1**

Dear Judge Sheridan:

It is counsel's intent to appeal to Your Honor, Magistrate Madeline Cox Arleo's revocation of Michael Velez' bail on his arrest on a domestic violence charge. I am awaiting a copy of the transcript of the hearing. In order that I may properly represent my client at a hearing, I need various records from the files maintained by his United States Pretrial Services Officer. Specifically, I need the following:

1. A copy of any and all domestic violence complaints filed against Mr. Velez by Tameerah N. Green upon which probation cited in their violation of bail report;
2. Any and all pictures evidencing the injuries sustained by Tameerah N. Green as a result of the alleged domestic violence upon which probation cited in their violation of bail report;
3. A copy of any and all police records relative to reports of domestic violence

www.BNDF.net

REPLY TO:

☐ 445 EAST BROAD STREET  
PO Box 2189  
WESTFIELD, NJ 07091-2189  
TEL: (908) 232-0292  
FAX: (908) 232-3277

A handwritten signature, likely of a representative of Buttermore Newman Delaney &amp; Foltz, LLP, next to the New York office address.

111 BROADWAY  
SUITE 1805  
NEW YORK, NY 10006  
TEL: (212) 229-1516  
FAX: (212) 676-7497

☐ 105 HAWK COURT  
MILFORD, PA 18337  
TEL: (570) 296-2420  
FAX: (570) 296-4247

A handwritten signature, "Peter G. Sheridan", with the date "9/1/09" written below it.

upon with probation relied upon their violation of bail report.

4. A complete copy of the file maintained by US PTS Officer Elizabeth Auson, with respect to Michael Velez, including, but not limited to reports, notes (handwritten and typed), records of telephone conversations with Mr. Velez, etc.

It is my understanding that a Court Order is necessary before the United States Pretrial Services Office is permitted to make this information available to me. Accordingly, I respectfully request that the Court, by endorsing this letter, direct the United States Pretrial Services Office to make available to the undersigned counsel the requested documents.

Respectfully submitted,

A handwritten signature in black ink that reads "Donna R. Newman /ad". The signature is written in a cursive, flowing style.

Donna R. Newman

DRN/ad

cc: AUSA Erez Liebermann, Esq.-via ECF  
Michael Velez